

CJ2
9.10.18

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA CLERK'S OFFICE
AT BALTIMORE CRIMINAL NO.

v.

BY K *DEPUTY UNDER SEAL CC18-0472

ALPHONSO DARNELL WHITE (a/k/a
"Ali")

Defendant

* (Conspiracy to Distribute and Possess
* with Intent to Distribute Heroin, 21
* U.S.C. § 846; Aiding and Abetting, 18
* U.S.C. § 2; Forfeiture, 21 U.S.C. § 853,
* 28 U.S.C. § 2461)
*
*

INDICTMENT

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute
Controlled Dangerous Substances)

The Grand Jury for the District of Maryland charges that:

From in or around 2008 until in or around 2018, in the District of Maryland and elsewhere,
the Defendant,

ALPHONSO DARNELL WHITE

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a schedule I controlled substance, a mixture and substance containing a detectable amount of fentanyl, a schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. § 846
18 U.S.C. § 2

Quantity of Controlled Substances Involved in the Conspiracy

1. With respect to **ALPHONSO DARNELL WHITE**, the quantity of controlled substances in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture and substance containing a detectable amount of heroin pursuant to 21 U.S.C. § 841(b)(1)(A)(i).

21 U.S.C. § 846

18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Upon the conviction of an offense in violation of 21 U.S.C. § 846 the Defendant shall forfeit the following property to the United States pursuant to 21 U.S.C. § 853(a):

a. Any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such violation; and

b. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

2. If any of the property described above, as a result of any act or omission of the Defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). If the United States is not able to forfeit the specific property listed above directly, it intends to forfeit it as substitute property.

21 U.S.C. § 853;

28 U.S.C. § 2461(c)

Robert K. Hur / JCM

Robert K. Hur
United States Attorney

A TRUE BILL:

September 12, 2018
Date

SIGNATURE REDACTED

Foreperson